

Dec 26, 2023

s/ Mariah Kauder

Deputy Clerk, U.S. District Court
Eastern District of Wisconsin

UNITED STATES DISTRICT COURT

for the
Eastern District of Wisconsin

In the Matter of the Search of)

(Briefly describe the property to be searched
or identify the person by name and address))INFORMATION ASSOCIATED WITH THE CELLULAR TELEPHONE
ASSIGNED CALL NUMBER 346-210-7043, WITH INTERNATIONAL
MOBILE SUBSCRIBER IDENTITY/ ELECTRONIC SERIAL NUMBER
3111480028275342, THAT IS STORED AT PREMISES CONTROLLED BY
VERIZON.)

Case No. 23-M-552 (SCD)

WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search and seizure
of the following person or property located in the _____ District of _____

(identify the person or describe the property to be searched and give its location):

Please see Attachment A.


I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property
described above, and that such search will reveal (identify the person or describe the property to be seized):

Please see Attachment B.

1-9-24

YOU ARE COMMANDED to execute this warrant on or before _____ (not to exceed 14 days)☐ in the daytime 6:00 a.m. to 10:00 p.m. ☒ at any time in the day or night because good cause has been established.Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the
person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the
property was taken.The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory
as required by law and promptly return this warrant and inventory to _____
Honorable Stephen C. Dries
(United States Magistrate Judge)☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C.
§ 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose
property, will be searched or seized (check the appropriate box)☐ for _____ days (not to exceed 30) ☐ until, the facts justifying, the later specific date of _____

Date and time issued: 12-26-23 9:20 am


Judge's signature

City and state: Milwaukee, WI

Honorable Stephen C. Dries, U.S. Magistrate Judge

Printed name and title

Return		
Case No.:	Date and time warrant executed:	Copy of warrant and inventory left with:
Inventory made in the presence of :		
Inventory of the property taken and name(s) of any person(s) seized:		
Certification		
<p>I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.</p> <div style="display: flex; justify-content: space-between; align-items: flex-end;"> <div style="width: 30%;"> <p>Date: _____</p> </div> <div style="width: 65%;"> <p style="text-align: center;">_____</p> <p style="text-align: center;"><i>Executing officer's signature</i></p> <p style="text-align: center;">_____</p> <p style="text-align: center;"><i>Printed name and title</i></p> </div> </div>		

ATTACHMENT A

Property to Be Searched

This warrant applies to records and information associated with the cellular telephone assigned call number **346-210-7043**, (“the Account”), that are stored at premises controlled by **VERIZON** (“the Provider”), headquartered at **180 Washington Valley Road, Bedminster, NJ 07921**.

ATTACHMENT B

Particular Things to be Seized

I. Information to be Disclosed by the Provider

To the extent that the information described in Attachment A is within the possession, custody, or control of the Provider, including any information that has been deleted but is still available to the Provider or that has been preserved pursuant to a request made under 18 U.S.C. § 2703(f), the Provider is required to disclose to the government the following information pertaining to the Account listed in Attachment A for the time period of **October 1, 2023 through October 31, 2023**:

- a. The following subscriber and extended subscriber information about the customers or subscribers of the Account:
 - i. Names (including subscriber names, usernames, and screen names);
 - ii. Addresses (including mailing addresses, residential addresses, business addresses, and e-mail addresses);
 - iii. Local and long-distance telephone connection records;
 - iv. Records of session times and durations, and the temporarily assigned network addresses (such as Internet Protocol (“IP”) addresses) associated with those sessions;
 - v. Length of service (including start date) and types of service utilized;
 - vi. Telephone or instrument numbers (including MAC addresses, Electronic Serial Numbers (“ESN”), Mobile Electronic Identity Numbers (“MEIN”), Mobile Equipment Identifier (“MEID”); Mobile Identification Number (“MIN”), Subscriber Identity Modules (“SIM”), Mobile Subscriber Integrated Services Digital Network Number (“MSISDN”); International Mobile Subscriber Identity Identifiers (“IMSI”), or International Mobile Equipment Identities (“IMEI”); device make and model;
 - vii. Other subscriber numbers or identities (including the registration Internet Protocol (“IP”) address); and

- viii. Means and source of payment for such service (including any credit card or bank account number) and billing records.
- b. All records and other information (not including the contents of communications) relating to wire and electronic communications sent or received by the Account, including:
 - i. the date and time of the communication, the method of the communication, and the source and destination of the communication (such as the source and destination telephone numbers); call detail records for voice, SMS, MMS, and data; email addresses and IP addresses (including source and destination); and
 - ii. information regarding the cell towers and sectors through which the communications were sent and received; and
 - iii. per call measurement and timing advance data (PCMD, RTT, True Call, LOCDBOR, or similar)

II. Information to be Seized by the Government

All information described above in Section I that constitutes evidence of violations of **Title 18, United States Code 2113(a) (Bank Robbery)** involving **Russell Roquemore XX/XX/2002** during the period of **October 1, 2023 through October 31, 2023**.

Dec 26, 2023

s/ Mariah Kauder

Deputy Clerk, U.S. District Court
Eastern District of Wisconsin

UNITED STATES DISTRICT COURT

for the
Eastern District of Wisconsin

In the Matter of the Search of

*(Briefly describe the property to be searched
or identify the person by name and address)*INFORMATION ASSOCIATED WITH THE CELLULAR TELEPHONE
ASSIGNED CALL NUMBER 346-210-7043, WITH INTERNATIONAL MOBILE
SUBSCRIBER IDENTITY / ELECTRONIC SERIAL NUMBER
3111480028275342, THAT IS STORED AT PREMISES CONTROLLED BY
VERIZON.

Case No. 23-M-552 (SCD)

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

Please see Attachment A.

located in the _____ District of _____, there is now concealed *(identify the person or describe the property to be seized)*:

Please see Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
- ☐ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section
18 U.S.C. §2113 (a)

Bank Robbery

Offense Description

The application is based on these facts:

Please see Affidavit.

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days *(give exact ending date if more than 30 days)*: _____ is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

Martin Keck, Task Force Officer, FBI

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
_____ telephone _____ *(specify reliable electronic means)*.

Date: 12-26-23

City and state: Milwaukee, WI



Judge's signature

Honorable Stephen C. Dries, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT

I, Martin Keck, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant for information associated with a certain cellular telephone assigned call number **346-210-7043**, (“the SUBJECT PHONE”), that is stored at premises controlled by **VERIZON**, a wireless telephone service provider headquartered at **180 Washington Valley Road, Bedminster, NJ 07921**. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. § 2703(c)(1)(A) to require **VERIZON** to disclose to the government copies of the information further described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review the information to locate items described in Section II of Attachment B.

2. I am currently employed as a Detective for the Wauwatosa Police Department. I have been employed as a law enforcement officer for over sixteen years. Since October 2018, I have been assigned as a federally deputized Task Force Officer (TFO) on the Federal Bureau of Investigation (FBI) Milwaukee Area Violent Crimes Task Force, a multi-jurisdictional law enforcement entity charged with investigating violations of federal law, including bank robberies, commercial robberies, armed motor vehicle robberies (carjackings), and other violent crime matters, defined under Title 18 of the United States Code. I have participated in the investigation of numerous violent crimes, including armed bank robberies, armed motor vehicle robberies, and armed commercial robbery investigations in violation of Title 18, United States Code, Sections 924(c), 1951, 1956, 1957, 2113, and 2, and other related offenses. I have been

trained in a variety of investigative and legal matters, including the topics of Fourth Amendment searches, the drafting of search warrant affidavits, and probable cause. I have participated in criminal investigations, surveillance, search warrants, cellular telephone extractions, interviews, DNA collection, and debriefs of arrested subjects. As a result of this training and investigative experience, I have learned how and why violent actors typically conduct various aspects of their criminal activities.

3. I have conducted and/or assisted with investigations of violent crime violations in conjunction with agents and officers from other jurisdictions and have received training from these agents and officers in conducting these investigations. I have also conducted and/or assisted with investigations that have led to the arrest of persons for violations of law dealing with commercial robberies.

4. This affidavit is based upon my personal knowledge, training and experience, and on information reported to me by other federal, state, and local law enforcement officers during the course of their official duties, all of whom I believe to be truthful and reliable. This affidavit is also based upon my review of police reports, official records, citizen witnesses' statements, consent searches, recorded statements, law enforcement surveillance, surveillance video, court records, and public records which I consider to be reliable as set forth herein. The facts of this Affidavit are based upon information obtained from my investigation, as well as information I have received from other law enforcement officers.

5. Based on the investigation to date, I submit that there is probable cause to believe that Paul R. Banks III (DOB XX/XX/1994) and Russell Roquemore (DOB XX/XX/2002) conspired with one another to commit and committed a robbery of an ATM technician, in violation of Title 18, United States Code, Sections 2113(a) (Bank Robbery).

6. Because this affidavit is submitted for the limited purpose of obtaining a search warrant, I have not included each and every fact known to me concerning this investigation. I have attempted to set forth only the facts I believe are pertinent to establishing the necessary foundation for the search warrant.

PROBABLE CAUSE

7. On Friday, October 27, 2023, at approximately 2:11pm, Wauwatosa Police Officers were dispatched to the Wells Fargo Bank located at 2675 North Mayfair Road, Wauwatosa, WI for a report of a robbery. Upon arrival, officers learned an individual servicing the Wells Fargo Bank ATM was robbed by force. A total of \$170,650 U.S. currency was stolen during the robbery.

8. Wauwatosa Police Detective Jeremy Bronner spoke with the victim, identified as SRV. SRV stated that he is an employee of NCR Atleos and services ATMs. On October 27, 2023, at approximately 1:40pm, SRV arrived at the ATM located at the Wells Fargo Bank at 2675 North Mayfair Road to service the ATM. After being at the ATM for approximately thirty minutes, SRV observed two subjects walk towards him. One of the subjects pushed him backwards. The two subjects then grabbed two cassettes each (total of four cassettes) from the ATM and ran back to a white SUV parked near SRV's vehicle. The subjects then fled in the vehicle southbound on North Mayfair Road.

9. SRV described the two subjects as:

- a. Suspect 1 – Black male, unknown age, unknown height, thin build. He was wearing a light-colored long sleeve shirt, blue jean pants and gym shoes. The suspect's face was covered with a mask, and he was wearing blue surgical gloves.

- b. Suspect 2 – Black male, unknown age, unknown height, thin build. He was wearing a light-colored long sleeve shirt, blue jean pants and gym shoes. The suspect's face was covered with a mask and he was wearing blue surgical gloves.

10. SRV described the vehicle the suspects fled in as a white Ford Bronco with Illinois plate.

11. SRV did not consent to being robbed.

12. Wauwatosa Police Detective Martin Keck is aware that video footage of the robbery was collected. The video shows two suspects wearing grey hooded sweatshirts, one with grey pants and one with black pants approach the ATM and take the cassettes out of the ATM. The suspects are masked and wearing gloves. The video collected depicts a white Ford Bronco Sport with black rims and black tinted windows as the suspect vehicle.

13. A search of the scene by Detectives revealed recovery of a driver's license for **Paul Roosevelt Banks III (M/B XX/XX/1994)** in the parking lot where the robbery occurred. The driver's license was located directly behind (to the west of) the victim's work vehicle. This is the location the suspects came from prior to the robbery and ran to after the robbery. The driver's license was in a bundle of US currency folded in half. Banks has a listed address of XXX Junell St., Houston, TX 77088.

14. Detective Keck conducted a record check of Banks. The records check revealed Banks is currently on federal probation and has a fully extraditable warrant for a probation violation through the United States Marshalls Service. He was placed on probation for robbery. Banks has a criminal history involving armed robberies including ATM robberies and pharmacy robberies.

15. Investigators conducted a FLOCK check in the area of the robbery. FLOCK is a software program that allows users to search for vehicles and license plates captured by cameras that are dispersed throughout the Milwaukee area. The software allows you to search for vehicles by license plate or run queries based off of vehicle color, make and style. Investigators located a white Ford Bronco Sport with black rims and tinted windows bearing a California license plate of 9AFZ537 traveling northbound on North Mayfair Road at West Bluemound Road on October 27, 2023, at 1:32pm. Still images of the FLOCK image were compared with images of the suspect auto at the robbery scene and all of the features of the vehicle were found to be a match.

16. Additionally, a search of the FLOCK system revealed that the Ford Bronco was in Houston, Texas as late as 9:14pm on Wednesday, October 25, 2023. Thus, the vehicle traveled from Texas to Wisconsin sometime after 9:14pm on October 25, 2023. On October 26, 2023, at 3:57pm, the vehicle was captured by a FLOCK camera in the City of West Allis.

17. Detective Keck conducted a records check of CA license plate 9AFZ537 and learned that the vehicle is registered to a 2021 Ford. The VIN of the vehicle is 3FMCR9B63MRB31756. The vehicle is registered to Hertz Vehicles, LLC – a rental car.

18. Following the robbery, investigators continued to search FLOCK and other license plate cameras throughout the United States and did not get any readings on the vehicle.

19. Wauwatosa Police Detective Nick Stahl reviewed DOT video cameras in the area of the robbery. He concluded the suspect vehicle likely turned westbound on West North Avenue at North Mayfair Road. This turn lane is not captured by cameras, but all of the likely escape routes were recorded by cameras. In viewing all of the likely escape routes, the suspect vehicle was not captured, leading to Detective Stahl's conclusion that the vehicle likely turned westbound on West North Avenue.

20. On November 1, 2023, at approximately 12:55pm, Detective Keck and Milwaukee County District Attorney's Office Investigator Steven Strasser checked the area to the west of North Mayfair Road and West North Avenue and discovered the 2021 Ford Bronco bearing CA registration plates of 9AFZ537 located in the parking lot of Normandy Village, in the 2500 block of North 124th Street, in the City of Wauwatosa, County of Milwaukee, State of Wisconsin. The Normandy Village parking lot is approximately sixteen blocks to the west and approximately two blocks to the south of where the robbery occurred.

21. The Ford Bronco was covered in snow, indicative of not traveling for at least the last day. The vehicle was backed into a parking spot. In plain view, detectives observed the passenger compartment was clean, but a water bottle was in the cup holder of the passenger's side front door. The Ford Bronco was seized and towed to the Wauwatosa Police Department's secure evidence garage.

22. On November 1, 2023, Detective Keck applied for and was granted a search warrant in Milwaukee County Circuit Court to forensically examine the recovered Ford Bronco that was used to commit the Robbery.

23. On November 2, 2023, Detective Bradley Isaacson removed the Electronic Control Unit (ECU) as trained from the Ford Bronco. Detective Isaacson used the digital forensic software Berla iVe tool to complete a logical acquisition from the module. Detective Isaacson analyzed the data from vehicle's infotainment and telematics' systems.

24. Detective Isaacson reviewed the Ford Bronco's tracklog which showed the vehicle was present in the Wells Fargo parking lot at the time of the Robbery. The vehicle's track log showed the vehicle departed the bank's parking lot and traveled southbound on North Mayfair

Road. The vehicle turned westbound on West North Avenue and continued northbound on North 124th Street. The vehicle then parked at Normandy Village.

25. Detective Isaacson determined an iPhone with the friendly name of “Paul’s iPhone” connected to the Ford Bronco at the following dates/times:

a. 10/26/2023

1. 4:06:04am

b. 10/27/2023.

1. 6:17:35am

2. 7:01:13am

3. 7:15:51am

4. 12:58:07pm

5. 2:17:30pm

6. 6:40:08pm

26. Detective Isaacson determined that “Paul’s iPhone” was disconnected from the vehicle at 2:17pm on October 27, 2023, while parked at Normandy Village, 2500 block of North 124th Street in the City of Wauwatosa. This information is consistent with the vehicle’s tracklog history and the ignition being turned off. This is the same location Detective Keck recovered the vehicle from.

27. With the use of the forensic tools, Berla iVe, Detective Isaacson identified “Paul’s iPhone’s” unique identifying number as A8FE9D66175D and a subscriber phone number of 713-658-5668. The service provider for the phone number is AT&T.

28. Detective Isaacson conducted additional analysis of the vehicle’s tracklog on October 26, 2023, and October 27, 2023. Detective Isaacson determined the vehicle was present

at the Super 8 by Wyndham, 7601 118th Ave, Pleasant Prairie, WI on the evening hours on October 26, 2023, and the early morning hours on October 27, 2023.

29. Detective Keck made contact at the Super 8 on November 2, 2023, and was shown the Ford Bronco on surveillance video. Detective Keck learned the renter of the room associated with the Ford Bronco was a Russell Roquemore and that the vehicle was present at the Super 8 on October 26th and 27th, 2023. The hotel staff provided an address of 1718 Granger St, Houston, TX for Roquemore.

30. Detective Isaacson also discovered the occupants of the Ford Bronco used the gas station north of the Super 8. The gas station was identified as Mobile Gas Station, 7511 118th St, Pleasant Prairie, WI. Detective Keck obtained surveillance video from the gas station on November 2, 2023, and observed an individual exit the Ford Bronco and entered the store. Still images were captured of the black male subject.

31. Additionally, Detective Keck utilized a law enforcement tool Automated Facial Recognition (AFR). The gas station photographs were loaded into the program which yielded a 100% return identifying the subject as Russell Roquemore with a date of birth as XX/XX/2002. Detective Keck confirmed the individual depicted in the video was Russell Roquemore.

32. Detective Isaacson reviewed “Paul’s iPhone” within the Berla iVe digital report which showed 251 contacts were captured when “Paul’s iPhone” was synced to the Ford Bronco.

33. Detective Isaacson located the contact name “Russ” with a cellphone number of **346-210-7043** within the 251 contacts.

34. Detective Isaacson also located another iPhone device that was connected to the Ford Bronco on October 26, 2023, at 9:06:33 am. Detective Isaacson identified the iPhone’s

unique identifying number as 2CC2537EE908 and a subscriber phone number of **346-210-7043**. The service provider for the phone number is Verizon.

35. Detective Isaacson conducted an open search through the popular financial application “Cash App” and searched the phone number **346-210-7043** which showed the phone number is associated with the name Russell Roquemore (\$Kingruss6).

36. On November 2, 2023, Detective Isaacson drafted a search warrant to track the device associated with the phone number 713-658-5668. The warrant was authorized by the Milwaukee County Circuit Court. On November 3, 2023, Detective Keck received historical records associated with the phone number 713-658-5668. Detective Keck found the following relevant to this investigation:

- a. The listed user of the device is “Paul Banks.”
- b. The cell site data associated with the phone number was consistent with moving with the Ford Bronco (compared with data obtained from the Berla iVe extraction), including being present in the area of the robbery at the time of the robbery as well as various locations investigators obtained video of the Ford Bronco and its occupants.
- c. The device was connected to cell sites in the area of Chicago O’Hare International Airport as late as 6:13am on October 28, 2023. The device was then connecting to cell sites in the area of George Bush International Airport at 8:23am on October 28, 2023.

37. On November 3, 2023, Detective Isaacson drafted a search warrant to track the device associated with the phone number 346-210-7043. The warrant was authorized by the Milwaukee County Circuit Court. On November 6, 2023, Detective Keck received historical

records associated with the phone number 346-210-7043. Detective Keck found the following relevant to this investigation:

- a. The listed user of the device is “Russell Roquemore”.
- b. The cell site data associated with the phone number was consistent with moving with the Ford Bronco (compared with data obtained from the Berla iVe extraction), including being present in the area of the robbery at the time of the robbery as well as various locations investigators obtained video of the Ford Bronco and its occupants.
- c. The device connected to cell sites in the area of Chicago O’Hare International Airport as late as 6:13am on October 28, 2023. The device was then connecting to cell sites in the area of George Bush International Airport at 8:23am on October 28, 2023.

38. On October 28, 2023, (day after robbery) the Verizon account with the phone number 346-210-7043 was changed to 832-596-8820. The subscriber remained Russell Roquemore.

39. FBI Special Agent Rienenrth informed Detective Keck that the AT&T account with the phone number 713-658-5668 was changed to 832-258-6943 on November 3, 2023.

40. Task Force Officer (TFO) Massari, who is employed as a United States Postal Inspector, followed up at various locations from the Ford Bronco’s extraction report indicated the vehicle was at the Dick’s Sporting Goods, located at 9899 76th Street, in the City of Kenosha, WI from 5:52pm to 6:02pm on October 26, 2023. TFO Massari obtained an image of the suspects entering the Dick’s Sporting Goods. In the photo, the suspects are wearing what appears to be the same sweatshirt and pants that the suspects were wearing during the robbery. Detective. Keck

compared images of the suspects at Dicks with known images of Russell Roquemore and Paul Banks. Detective Keck identified the people at Dicks to be Russell Roquemore, (wearing the grey pants) and Paul Banks (wearing the black pants).

41. TFO Keck was made aware of a similar ATM technician robbery which occurred on 10/12/23 at the Wells Fargo Bank, located at 5710 Constitution Ave., in Colorado Springs, CO. The suspects in this offense were wearing what appeared to be the same gloves. The suspects had their faces covered in a similar fashion and appeared to have the same body builds as the suspects in the Wauwatosa robbery on 10/27/23.

42. In my training and experience, I have learned that **VERIZON** is a company that provides cellular telephone access to the general public. I also know that providers of cellular telephone service have technical capabilities that allow them to collect and generate information about the locations of the cellular telephones to which they provide service, including cell-site data, also known as “tower/face information” or “cell tower/sector records.” Cell-site data identifies the “cell towers” (i.e., antenna towers covering specific geographic areas) that received a radio signal from the cellular telephone and, in some cases, the “sector” (i.e., faces of the towers) to which the telephone connected. These towers are often a half-mile or more apart, even in urban areas, and can be 10 or more miles apart in rural areas. Furthermore, the tower closest to a wireless device does not necessarily serve every call made to or from that device. Accordingly, cell-site data provides an approximate location of the cellular telephone but is typically less precise than other types of location information, such as E-911 Phase II data or Global Positioning Device (“GPS”) data.

43. Based on my training and experience, I know that **VERIZON** can collect cell-site data about the SUBJECT PHONE. I also know that wireless providers such as **VERIZON**

typically collect and retain cell-site data pertaining to cellular phones to which they provide service in their normal course of business in order to use this information for various business-related purposes.

44. Based on my training and experience, I know that wireless providers such as **VERIZON** typically collect and retain information about their subscribers in their normal course of business. This information can include basic personal information about the subscriber, such as name and address, and the method(s) of payment (such as credit card account number) provided by the subscriber to pay for wireless telephone service. I also know that wireless providers such as **VERIZON** typically collect and retain information about their subscribers' use of the wireless service, such as records about calls or other communications sent or received by a particular phone and other transactional records, in their normal course of business. In my training and experience, this information may constitute evidence of the crimes under investigation because the information can be used to identify the SUBJECT PHONE's user or users and may assist in the identification of co-conspirators and/or victims.

AUTHORIZATION REQUEST

45. Based on the foregoing, I request that the Court issue the proposed search warrant, pursuant to 18 U.S.C. § 2703(c) and Federal Rule of Criminal Procedure 41.

46. I further request that the Court direct **VERIZON** to disclose to the government any information described in Section I of Attachment B that is within its possession, custody, or control. Because the warrant will be served on **VERIZON**, who will then compile the requested records at a time convenient to it, reasonable cause exists to permit the execution of the requested warrant at any time in the day or night.

47. I further request that the Court order that all papers in support of this application, including the affidavit and search warrant, be sealed until further order of the Court. These documents discuss an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may seriously jeopardize that investigation, including by giving targets an opportunity to destroy or tamper with evidence, change patterns of behavior, notify confederates, and flee from prosecution.

ATTACHMENT A

Property to Be Searched

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I. Information to be Disclosed by the Provider

To the extent that the information described in Attachment A is within the possession, custody, or control of the Provider, including any information that has been deleted but is still available to the Provider or that has been preserved pursuant to a request made under 18 U.S.C. § 2703(f), the Provider is required to disclose to the government the following information pertaining to the Account listed in Attachment A for the time period of **October 1, 2023 through October 31, 2023**:

- a. The following subscriber and extended subscriber information about the customers or subscribers of the Account:
 - i. Names (including subscriber names, usernames, and screen names);
 - ii. Addresses (including mailing addresses, residential addresses, business addresses, and e-mail addresses);
 - iii. Local and long-distance telephone connection records;
 - iv. Records of session times and durations, and the temporarily assigned network addresses (such as Internet Protocol (“IP”) addresses) associated with those sessions;
 - v. Length of service (including start date) and types of service utilized;
 - vi. Telephone or instrument numbers (including MAC addresses, Electronic Serial Numbers (“ESN”), Mobile Electronic Identity Numbers (“MEIN”), Mobile Equipment Identifier (“MEID”); Mobile Identification Number (“MIN”), Subscriber Identity Modules (“SIM”), Mobile Subscriber Integrated Services Digital Network Number (“MSISDN”); International Mobile Subscriber Identity Identifiers (“IMSI”), or International Mobile Equipment Identities (“IMEI”); device make and model;
 - vii. Other subscriber numbers or identities (including the registration Internet Protocol (“IP”) address); and

- viii. Means and source of payment for such service (including any credit card or bank account number) and billing records.
- b. All records and other information (not including the contents of communications) relating to wire and electronic communications sent or received by the Account, including:
 - i. the date and time of the communication, the method of the communication, and the source and destination of the communication (such as the source and destination telephone numbers); call detail records for voice, SMS, MMS, and data; email addresses and IP addresses (including source and destination); and
 - ii. information regarding the cell towers and sectors through which the communications were sent and received; and
 - iii. per call measurement and timing advance data (PCMD, RTT, True Call, LOCDBOR, or similar)

II. Information to be Seized by the Government

All information described above in Section I that constitutes evidence of violations of **Title 18, United States Code 2113(a) (Bank Robbery)** involving **Russell Roquemore XX/XX/2002** during the period of **October 1, 2023 through October 31, 2023**.